

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

DEREK DEYOUNG,
a resident of Michigan,

Plaintiff,

Case No.: 1:20-cv-51

v.

PRINTABEL COMPANY LIMITED, a Hong
Kong limited by shares company,

THUY PHAN THIEN HA DONG, an individual
resident of Vietnam, and

DOES 1-10,

Defendants.

**CONSOLIDATED MOTION FOR LEAVE TO AMEND, ORDER TO SHOW CAUSE AS
TO WHY DEFENDANTS PRINTABEL COMPANY LIMITED AND PHAN SHOULD
NOT BE HELD IN CONTEMPT, AND FOR ADDITIONAL EXPEDITED DISCOVERY**

For his Consolidated Motion for Leave to Amend, Order to Show Cause as to Why Defendants Printabel Company Limited and Phan Should Not Be Held in Contempt, and for Additional Expedited Discovery in this matter, Plaintiff, Derek DeYoung, by and through his attorneys Revision Legal, PLLC, states as follows:

1. Defendants have lied to this Court about their ownership of numerous websites, continue to infringe upon DeYoung's works, and have transferred \$327,900 out of their PayPal account after the issuance of the preliminary injunction in this matter.
2. Defendants have thumbed their noses at this Court's orders and have shown a willingness to continue their scams even under the threat of contempt.

3. DeYoung now moves for an order to show cause as to why Defendants should not be held in both civil and criminal contempt.
4. Further, DeYoung moves and seeks leave to add newly-identified parties and claims, and moves and seeks additional expedited discovery to Defendants' service providers to identify all necessary parties, websites, and financial accounts under Defendants' ownership and control.
5. DeYoung hereby relies on his Brief in Support of Consolidated Motion for Leave to Amend, Order to Show Cause as to Why Defendants Printabel Company Limited and Phan Should Not Be Held in Contempt, and for Additional Expedited Discovery in support of his Motion.

Date: February 28, 2020

Derek DeYoung

/s/ John Di Giacomo
John Di Giacomo
Eric Misterovich
Amanda Osorio
Attorneys for Plaintiff
Revision Legal, PLLC
444 Cass St., Suite D
Traverse City, MI 49684
Phone: (231) 714-0100
Fax: (231) 714-0200
john@revisionlegal.com
eric@revisionlegal.com
amanda@revisionlegal.com